

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	No. 4:20-CR-212
	§	Judge Mazzant
DEBRA LYNN MERCER-ERWIN (1)	§	
KAYLEIGH MOFFETT (2)	§	
CARLOS ROCHA VILLAUERRUTIA (5)	§	

**EXHIBIT LIST**

EXHIBIT NO.	SPONSOR	DESCRIPTION	O F F	O B J	E N T
1		CyrusOne Server Physical Exhibit			
1A		Ledger from CyrusOne Server			
1B		Search Warrant for CyrusOne Server			
1C		Scanned Docs from CyrusOne Server			
1D		Intentionally Left Blank			
1E		Sample Transactions by AGC from CyrusOne Server			
1F		Server Extraction of American Express Transactions from CyrusOne Server			
1G		Server Extraction of Escrow Agreements & EFaxes for AGC (Binder – physical exhibit)			
2A		Mercer Email Attachment 9H-DTY-S6146 Escrow Agreement (EA)			
2B		Mercer Email Attachment 9H-LZM-S6073 EA			
2C		Mercer Email Attachment N253MY-S23974 EA			
2D		Mercer Email Attachment N351AA-S24032 EA			
2E		Mercer Email Attachment P4-GIS-S139 EA			
2F		EFax			

<b>EXHIBIT NO.</b>	<b>SPONSOR</b>	<b>DESCRIPTION</b>	<b>O F F</b>	<b>O B J</b>	<b>E N T</b>
3A		Mercer Email Attachment N784CK-S24783 EA			
3B		Mercer Email Attachment N784CK-S24783 First Amendment (FA) EA			
3C		Mercer Email Attachment N784CK-S24783 Executed (E) EA			
3D		Mercer Email Attachment N571UA-S27311 EA			
3E		Mercer Email Attachment N571UA-S27311 FAEA			
3F		Mercer Email Attachment N571UA-S2731 EEA			
3G		Mercer Email Attachment N572UA-S27312 EA			
3H		Mercer Email Attachment N572UA-S27312 FAEA			
3I		Mercer Email Attachment N572UA-S27312 EEA			
3J		Mercer Email Attachment P4-GIS-S139			
4A		Mercer Email Attachment B-8211-S212 Letter of Intent (LOI)			
4B		ATT00001(3) – Mercer Email B-8211-S212			
4C		Mercer Email Attachment B-16720-S41820 Purchase Agreement (PA)			
4D		329950 Email and Attachments (Escrow & ATT00001) – Mercer Email B-16720-S41820			
4E		Mercer Email Attachment B-16720-S41820 Third Amended (TA) EA			
4F		Mercer Email Attachment B-16720-S41820 EA			
4G		329619 Email and Attachments (Escrow (1) & ATT00001(1) – Mercer Email B-16720-S41820			

<b>EXHIBIT NO.</b>	<b>SPONSOR</b>	<b>DESCRIPTION</b>	<b>O F F</b>	<b>O B J</b>	<b>E N T</b>
4H		329607 Email and Attachments (Escrow & txt file) - Mercer Txt file B-16720-S41820			
5A		322236 - Moffett Email P4-GIS-S139			
5B		Moffett Email B-8108-S5129 Refund Undertaking			
5C		Moffett Email B-8108-S5129 Letter			
5D		Mercer Email B-8108-S5129 LOI			
5E		317931 – Moffett Email P4-GIS-S139			
6A		Mercer Email VT-SUG-S4387 EA			
6B		Mercer Email VT-SUG-S4387 PA			
6C		329727 - Mercer Email VT-SUG-S4387			
6D		Mercer Email VT-ALF-S36305 PA			
6E		Mercer Email VT-ALG-S36306 EA			
6F		5/1/20 - Machado / Mercer WhatsApp			
6G		329629 – Email and Attachments (Escrow & ATT00001) Mercer Email VT-SUG-S4387			
6H		EFax			
7A		329919 – Email and Attachments (Escrow & ATT00001(1)) Mercer Email B-8197-S9473			
7B		Escrow Agreement from Casey @ TBE			
7C		Mercer Email SU-GDN-S38288 / SU-GDP-S38290 EAs			
7D		Mercer Email 9M-FSL-S29062 EA			
7E		Mercer Email 9V-SWB-S33377 FA Promissory Note			

<b>EXHIBIT NO.</b>	<b>SPONSOR</b>	<b>DESCRIPTION</b>	<b>O F F</b>	<b>O B J</b>	<b>E N T</b>
7F		329719 – Email & Attachments (Escrow & ATT00001)– Mercer Email SU-GDN-S38288 / SU-GDP-S38290			
7G		EFax			
8A		Mercer Email 9V-SWA-34568 Second Amendment to Promissory Note			
8B		Mercer Email 9V-SWB-S33377 Second Amendment to Promissory Note			
8C		Mercer Email ET-ALO-S33768 EA (CCUR)			
8D		Mercer Email ET-ALO-S33768 EA (JDS1)			
8E		Mercer Email ET-ALP-S33769 EA (CCUR)			
8F		Mercer Email ET-ALP-S33769 EA (JDS1)			
8G		329606 – Email and Attachments (Escrow & ATT00001) – Mercer Email ET-ALO-S33768			
8H		Mercer Email Trust Number 3020-3028-3252			
8I		Mercer Email VH-LQD-S4371 EA			
8J		Mercer Email VH-LQF-S4375 EA			
8K		Mercer Email VH-LQG-S4376 EA			
8L		358444 Email – Mercer Email VH-LQD-S4371 - VH-LQF-S4375 - VH-LQG-S4376			
8M		Mercer Email VQ-BNU-S29908 PA			
8N		Mercer Email VQ-BNU-S29908 EA			
8O		Mercer Email 9M-FSL-S29062 PA			
8P		Mercer Email 9M-FSL-S2906 EA			
8Q		Mercer Email B-2064-S29157 PA			
8R		Mercer Email B-2064-S29157 EA			

<b>EXHIBIT NO.</b>	<b>SPONSOR</b>	<b>DESCRIPTION</b>	<b>O F F</b>	<b>O B J</b>	<b>E N T</b>
8S		Mercer Email EI-UUW-S30214 PA			
8T		Mercer Email EI-UUW-S30214 EA			
8U		Mercer Email VT-JES-S35159 Second Amendment (SA) EA			
8V		Mercer Email VT-JEU-S35160 SAEA			
8W		EFax			
9A		Mercer Email HL-8254-S40198 EA			
9B		Mercer Email HL-8254-S40198 Amended Letter Agreement			
9C		EFax			
10A		Mercer Email HL-8284-S40199 EA			
10B		Mercer Email Pk-GIA-S40074 EA			
10C		Mercer Email PK-GIK-S40073 EA			
10D		8/5/20 – Machado /Mercer SMS			
10E		8/5/20 – 8/7/20 Mercer/Chemtov SMS			
10F		8/5//20 - Machado/Chemtov WA			
10G		EFax			
11A		Moffett Email S4424 Letter			
11B		Moffett Email S4424 EA			
11C		EFax			
12		Bank of America Records – 9094 American Guaranty Company - 2015			
13		Bank of America Records – 9094 American Guaranty Company - 2016			

<b>EXHIBIT NO.</b>	<b>SPONSOR</b>	<b>DESCRIPTION</b>	<b>O F F</b>	<b>O B J</b>	<b>E N T</b>
14		Bank of America Records – 9094 American Guaranty Company - 2017			
15		Bank of America Records – 9094 American Guaranty Company – 2018			
16		Bank of America Records – 9094 American Guaranty Company - 2019			
17		Bank of America Records – 9094 American Guaranty Company - 2020			
18		DLE Escrow – Bank of America - 1222			
19		CrossFirst (Wright Brother’s Bank Account – 6592)			
20		Navy Federal Credit Union – Kayleigh Moffett			
21		Bank of America – Gustava Ramirez - 2425			
22		Hard drive containing Phone images of Kayleigh Moffett and Debra Mercer			
22A		Cell Phone Image from Hard Drive of Kayleigh Moffett 405-314-5168			
22B		Cell Phone Image from Hard Driver of Debra Mercer-Erwin – 405-501-0562			
22C		Text files from 405-314-5168 dated 8/27/2015			
23A		Cell Phone Dump of Apple iPhone 11 of Federico Machado – 754-581-2809			
23B		Extraction Report of Cell Phone Dump of Apple iPhone 11 of Federico Machado – 754-581-2809			
23C		Text Chats from Federico Machado iPhone dated 08/28/2015 and 02/20/2019			
24		Image of Apple Computer of Federico Machado			
25A		PowerPoint for N200Y			

<b>EXHIBIT NO.</b>	<b>SPONSOR</b>	<b>DESCRIPTION</b>	<b>O F F</b>	<b>O B J</b>	<b>E N T</b>
25B		PowerPoint for Ledger (Ex. 1A)			
25C		PowerPoint for Ledger (Ex. 2)			
25D		PowerPoint for Ledger – Sewell Ex. 1			
25E		PowerPoint for Ledger – Hodgkinson Ex. 1			
25F		PowerPoint Summary			
25G		Kayleigh Moffett Summary PowerPoint			
26A		Census – Existence - AGC			
26B		Census – Nonexistence – AGC			
27A		Casey Sullivan Diagram			
27B		Casey Sullivan Documents			
28		Physical Evidence Pre-signed Bill of Sale			
29		Spreadsheet of Duplicate planes in review by HR			
30		Video Google Search			
31		Video How to file an EEI			
32		2020 Escrow Fees from Debra Moffett Cell Phone			
33A		OFAC License determination			
33B		OFAC License determination			
34		Aircraft Working Group (AWG) List of names			
35A		Debra Mercer-Erwin Second Part of Interview			
35B		Transcript of Debra Mercer-Erwin Interview			
36A		Kayleigh Moffett Interview			
36B		Transcript of Kayleigh Moffett Interview			
37A		Call between Machado - Mercer			

<b>EXHIBIT NO.</b>	<b>SPONSOR</b>	<b>DESCRIPTION</b>	<b>O F F</b>	<b>O B J</b>	<b>E N T</b>
37B		Transcript of Call between Machado - Mercer			
38A		Federico Machado Phone Interview			
38B		Transcript of Federico Machado Phone Interview			
39		FAA Clarification Memo 2013			
40		Photo of El Chapo			
41		Semi-submersible sub video			
42		Photos of Defendants Debra Mercer-Erwin, Kayleigh Moffett and Carlos Villaurrutia			
43		AGC Website			
44		Email BIS Outreach to AGC – 21 March 2019			
45A		Wires Spreadsheet of 9094			
45B		Bank of America Credits 9094			
45C		Bank of American Debits 9094			
46		FAA Aircraft Registration and Recordation Process			
47		Debra Mercer EEI Filings			
48		Residential Photos of Debra Mercer and Kayleigh Moffett			
49		Photo of Guillermo Garcia Mendez			
<b>N8286M</b>					
50A		Blue Ribbon			
50B		Photo of Plane			
50C		Abandonment Form			



<b>EXHIBIT NO.</b>	<b>SPONSOR</b>	<b>DESCRIPTION</b>	<b>O F F</b>	<b>O B J</b>	<b>E N T</b>
50D		Power Aircraft Invoice (Longbeach)			
<b>N456PF</b>					
51A		Blue Ribbon			
51B		Photo of Plane			
51C		Abandonment Form			
51D		Photos of seizure of Plane			
<b>N260RC</b>					
52A		Blue Ribbon Registration			
52B		Photo of plane			
52C		AMOC			
52D		Texas Aircraft Exemption Certificate			
<b>N18BA/N299GS</b>					
53A		Blue Ribbon for N18BA			
53B		Blue Ribbon for N299GS			
53C		Photos of Plane N18BA/N299GS			
53D		AMOC			
53E		Photos of crash site			
<b>N305AG</b>					
54A		Blue Ribbon			
54B		Photos of Plane			
54C		AMOC			
54D		Photos of plane at landing strip			
54E		Video of Plane taking off			

<b>EXHIBIT NO.</b>	<b>SPONSOR</b>	<b>DESCRIPTION</b>	<b>O F F</b>	<b>O B J</b>	<b>E N T</b>
54F		Chain of Custody			
54G		Drugs			
54H		Lab Report			
54I		Fountainhead Report			
54J		Intentionally Left Blank			
54K		Text Exchange between Debra Mercer-Erwin and Federico Machado dated 02/06/2020			
<b>N311BD</b>					
55A		Blue Ribbon			
55B		Photo of Plane			
55C		AMOC			
55D		Aerotitle Escrow N311BD Subpoena			
55E		Intentionally Left Blank			
55F		Lab Report – Belize 02-11-2021 – 10k			
55G		Photos of Physical Drugs seized			
55H		Immigration Information			
55I		Fountain Head Report			
55J		Photo of Heriberto Calderon Gastelum			
55K		Intentionally Left Blank			
55L		Intentionally Left Blank			
55M		Photo of Drugs in plane			
55N		Intentionally Left Blank			
<b>N569LM</b>					
56A		Blue Ribbon			

<b>EXHIBIT NO.</b>	<b>SPONSOR</b>	<b>DESCRIPTION</b>	<b>O F F</b>	<b>O B J</b>	<b>E N T</b>
56B		Photo of plane – BIS seizure from Brownsville			
56C		Intentionally Left Blank			
56D		Photo of seizure of Plane			
<b>N515BA</b>					
57A		Blue Ribbon			
57B		Photo of Plane			
57C		AMOC			
57D		Photos of crash site			
<b>N770SW</b>					
58A		Blue Ribbon			
58B		Photo of Plane			
58C		AMOC			
58D		Photo of Federico Machado			
58E		Federico Machado Phone Interview			
58F		Transcript of Federico Machado Phone Interview			
<b>N224EA</b>					
59A		Blue Ribbon			
59B		Photo of Plane			
59C		AMOC			
59D		Video of crash site			
59E		Photo of crash site			
59F		Excerpt from Financial Records of Villaurrutia analyzed by IRS Sonia Hurtado			
<b>N241CW</b>					

<b>EXHIBIT NO.</b>	<b>SPONSOR</b>	<b>DESCRIPTION</b>	<b>O F F</b>	<b>O B J</b>	<b>E N T</b>
60A		Blue Ribbon			
60B		Photo of Plane			
60C		AMOC			
60D		Photos of crash site			
<b>N322BC</b>					
61A		Blue Ribbon			
61B		Photo of Plane			
61C		AMOC			
61D		Photo of seizure of Plane			
<b>N35531/N454SC</b>					
62A		Blue Ribbon			
62B		Photo of Plane			
62C		AMOC			
62D		Photos of seizure of Plane			
62E		Email to Jessie Villareal from Storm Flying Services 6/10/2019			
<b>N465BC</b>					
63A		Blue Ribbon			
63B		Photo of Plane			
63C		AMOC			
63D		Photos of seizure of Plane			
63E		Excerpts of Villaurrutia Financial Records analyzed from IRS Sonia Hurtado			
<b>N530GA</b>					

<b>EXHIBIT NO.</b>	<b>SPONSOR</b>	<b>DESCRIPTION</b>	<b>O F F</b>	<b>O B J</b>	<b>E N T</b>
64A		Blue Ribbon			
64B		Photos of Plane			
64C		AMOC			
64D		Photos of crash site			
<b>N939RR</b>					
65A		Blue Ribbon			
65B		Photo of Plane			
65C		AMOC			
65D		Photos of Drugs			
65E		Mexico Registration 05/04/2020			
65F		Chain of Custody from Guatemala			
65G		Lab Results Cocaine 11.45k			
65H		Physical Evidence – Cocaine 11.45k			
65I		Excerpts of Villaurrutia Financial Records analyzed from IRS Sonia Hurtado			
65J		Fountainhead Report			
<b>N990PA</b>					
66A		Blue Ribbon			
66B		Photos of Plane			
66C		Intentionally Left Blank			
66D		Photo of Plane crash site			
66E		Excerpts of Villaurrutia Financial Records analyzed by IRS Sonia Hurtado			
<b>N368AG</b>					

<b>EXHIBIT NO.</b>	<b>SPONSOR</b>	<b>DESCRIPTION</b>	<b>O F F</b>	<b>O B J</b>	<b>E N T</b>
67A		Blue Ribbon			
67B		Photos of Plane			
67C		AMOC			
<b>N2000</b>					
68A		Blue Ribbon			
68B		Photos of Plane			
68C		AMOC			
<b>N466MM/NN886N</b>					
69A		Blue Ribbon			
69B		Photos of Plane			
69C		AMOC			
69D		Photo of plane and drugs			
70		<b>Intentionally Left Blank</b>			
<b>N884AB</b>					
71A		Blue Ribbon			
71B		Photo of Plane			
71C		AMOC			
<b>N740HB</b>					
72A		Blue Ribbon			
72B		Photo of Plane			
72C		AMOC			
72D		Photo of unknown person loading Covid masks			

<b>EXHIBIT NO.</b>	<b>SPONSOR</b>	<b>DESCRIPTION</b>	<b>O F F</b>	<b>O B J</b>	<b>E N T</b>
<b>N777EH</b>					
73A		Blue Ribbon			
73B		Photo of Plane			
73C		AMOC			
73D		Photos of Drug Seizure of Plane			
73E		Article of Death of Michael Milligan			
73F		Chain of Custody for Bulk Cocaine			
73G		Chain of Custody of Samples			
73H		Drugs			
73I		Lab Report			
73J		Fountainhead			
73K		Jessie Villareal PowerPoint			
74		Villarrutia Wells Fargo			
75		Villarrutia Bank of America			
76		Business Documents – TWA			
77		Business Documents – Ford Electric			
78		Business Documents – Texton Enterprises			
79		Business Documents – Airvica			
80		Intentionally Left Blank			
81		Business Documents Global Jets, LLC			
82		Business Documents Aviation Escrow/Title			
83		Business Documents BMI Associates			
84		Business Documents Delta Title			

<b>EXHIBIT NO.</b>	<b>SPONSOR</b>	<b>DESCRIPTION</b>	<b>O F F</b>	<b>O B J</b>	<b>E N T</b>
85		Business Documents Lincoln Investment Holdings, Inc.			
86		Business Documents Global Business Jets, LLC			
87		Business Documents Global Television Network			
88		Business Documents InnerCharged, Inc.			
89		Business Documents Intercontinental Partners, Inc.			
90		Business Documents Paradise Garden SA DE CV			
91		Business Documents from Hildago County, Air Vica Enterprises			
92		Video of Plane landing			
93		Summary Chart of Terms			
94		Summary Chart of Individuals			
95		Summary Chart of FAA Regulations			
96A		Photo of Plane N190JH			
96B		N190JH Notice of Abandonment			
96C		Video of Plane taking off			
96D		Blue Ribbon of N190JH			
97		Paul Macke PowerPoint			
98A		Photos from seizure at 6007 Lytham Drive, Dallas, Texas			
98B		Drugs seized from 6007 Lytham Drive, Dallas, Texas			
98C		Lab reports for seizure at 6007 Lytham Drive, Dallas, Texas			



<b>EXHIBIT NO.</b>	<b>SPONSOR</b>	<b>DESCRIPTION</b>	<b>O F F</b>	<b>O B J</b>	<b>E N T</b>
98D		Miscellaneous documents seized from 6007 Lytham Drive, Dallas, Texas			
99A		Photos from seizure at port of entry			
99B		Drugs seized from port of entry			
99C		Lab report from port of entry seizure			
99D		Miscellaneous documents from port of entry seizure			
100		Plea Agreement for Raul Francisco De ASIS Quevedo Martinez			
101		Blue Ribbon N949CL			
102		Blue Ribbon N15HE			
103		Blue Ribbon N450BD			
104		Intentionally Left Blank			
105		Plea Agreement for Julio Cesar Olivas-Felix			
106		N200Y Documents from CyrusOne Server			
107		N448AS Documents from CyrusOne Server			
108		N286RW Documents from CyrusOne Server			
109		N350PE Documents from CyrusOne Server			
110		N838KE Documents from CyrusOne Server			
111		CrossFirst Bank Statements (5964)			
112		CrossFirst Bank Statements (9783)			
113		CrossFirst Bank Statements (1356)			
114		Bank of America Bank Statements (9081)			
115		County Appraisals			

<b>EXHIBIT NO.</b>	<b>SPONSOR</b>	<b>DESCRIPTION</b>	<b>O F F</b>	<b>O B J</b>	<b>E N T</b>
116		Sonia Hurtado Summary PowerPoint			
117		FedEx Receipt for Mailing to Sergio Araujo Flores from Search Warrant of August 19, 2020			
118		Blowup of photos of planes			
119		Intentionally Left Blank			
120		Photos of N173KS			
121		Bank of America letter regarding bank statements			
122		Tax Records of Carlos Villaurrutia			
123A		N375TC Blue Ribbon			
123B		Photo of Plane			
123C		Photos of crash site and seizure of drugs			
123D		Fountainhead Report			
123E		Chain of Custody			
123F		DEA Lab Report			
123G		Physical Drugs			
123H		Video of aircraft delivering cocaine N173KS			
124A		Debra Mercer-Erwin First part of Interview			
124B		Transcript of Debra Mercer-Erwin First part of Interview			

Respectfully submitted,

BRIT FEATHERSON  
United States Attorney

\_\_\_\_\_/s/\_\_\_\_\_  
ERNEST GONZALEZ  
Assistant United States Attorney  
Texas Bar No. 00789318  
101 E. Park Blvd., Suite 500  
Plano, Texas 75074  
(972) 509-1201  
(972) 509-1209 (fax)  
[Ernest.Gonzalez@usdoj.gov](mailto:Ernest.Gonzalez@usdoj.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was filed via electronic filing to defense counsel on April 10, 2023.

\_\_\_\_\_/s/\_\_\_\_\_  
ERNEST GONZALEZ